

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SYRACUSE MOUNTAINS
CORPORATION,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA S.A.,

Defendant.

Civil Action No.: 21-cv-2684-VEC

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, and upon the accompanying Memorandum of Law, dated September 1, 2023, the Local Civ. R. 56.1 Statement of Material Facts, dated September 1, 2023, the Declaration of Breno Cunha, dated September 1, 2023 and exhibits thereto, the Declaration of Shayda Vance, dated September 1, 2023 and exhibits thereto, and all prior proceedings and papers in this action, Plaintiff Syracuse Mountains Corporation (“Syracuse”), by and through its undersigned counsel, moves the Honorable Valerie Caproni of the United States District Court for the Southern District of New York, at 40 Foley Square, New York, New York 10007, for an Order granting summary judgment in Syracuse’s favor on all of Syracuse’s claims pursuant to Federal Rule of Civil Procedure 56, and for such further relief as the Court deems just, necessary, and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Court’s Memo Endorsement dated May 26, 2023 (ECF No. 119), any responses to this motion are due not later than Friday, September 29, 2023, and any replies are due not later than Friday, October 13, 2023.

Dated: September 1, 2023

Respectfully submitted,

HUGHES HUBBARD & REED LLP

s/

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